## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

**MDL No. 17-2795 (MJD/KMM)** 

DEFENDANTS' STATEMENT OF CONFIDENTIALITY REGARDING EXHIBIT TO DEFENDANTS' LETTER REQUEST FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF DEFENDANTS' MOTION FOR PROTECTIVE ORDER REGARDING PLAINTIFFS' THIRD-PARTY SUBPOENAS

Defendants in the above-captioned matter have filed Exhibit A to Defendants' Letter Request for Leave to File a Reply Brief in Support of Defendants' Motion for Protective Regarding Plaintiffs' Third-Party Subpoenas. Pursuant to the Protective Order in this action (ECF No. 464), Exhibit A has been designated "Confidential" and/or "Highly Confidential – Attorneys' Eyes Only" in its entirety. Because of this designation, redaction is impractical.

Dated: July 31, 2020 Respectfully submitted,

/s/ William A. McNab

William A. McNab (MN Bar No. 320924) Thomas H. Boyd (MN Bar No. 0200517) WINTHROP & WEINSTINE, P.A. Capella Tower, Suite 3500 225 South Sixth Street Minneapolis, MN 55402 Phone: (612) 604-6400 Fax: (612) 604-6800 wmcnab@winthrop.com tboyd@winthrop.com

Patrick E. Gibbs (CA Bar No. 183174) COOLEY LLP 3175 Hanover Street Palo Alto, California 94304 Phone: (650) 843-5000 Fax: (650) 849-7400 pgibbs@cooley.com

Ryan Blair (CA Bar No. 246724) COOLEY LLP 4402 Eastgate mall San Diego, CA 92121 Phone: (858) 550-6047 Fax: (858) 527-2750 rblair@cooley.com

Douglas P. Lobel (VA Bar No. 42329)
David A. Vogel (VA Bar No. 48971)
Dana A. Moss (VA Bar No. 80095)
COOLEY LLP
11951 Freedom Drive
Reston, Virginia 20190
Phone: (703) 456-8000
Fax: (703) 456-8100
dlobel@cooley.com
dvogel@cooley.com
dmoss@cooley.com

Sarah M. Lightdale (NY Bar No. 4395661) COOLEY LLP 55 Hudson Yards New York, New York 10001 Phone: (212) 479-6000 Fax: (212) 479-6275 slightdale@cooley.com

Jerry W. Blackwell (MN Bar No. 186867) BLACKWELL BURKE P.A. 431 South 7th Street, Suite 2500 Minneapolis, MN 55415 Telephone: (612) 343-3200 blackwell@blackwellburke.com

Attorneys for Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey